

1. Will authorization of supplemental audio channel capability encourage your station to convert to digital broadcasting?

*Absolutely. HD radio may enhance quality of signal, and may reduce some interference in reception. However, for a rural statewide network with 14 transmitters and numerous translators, the costs of digital conversion are quite high – especially considering the low population densities of the West and of rural areas in general. The cost-benefit ratio must have more weight on the benefits to justify the capital costs, which are in the vicinity of \$1,000,000 just for our current transmitters alone: about \$2 per Wyoming citizen.*

*However, the promise of doubling the capacity for public service broadcasting via multiplexing – implementing supplemental audio channels - decisively tilts the cost-benefit ratio in favor of radio digital conversion. In effect, we can create a second state-wide network “overnight,” delivering more of the choice and diversity of **local** programming to rural Americans which they otherwise may not enjoy. We are dedicated to serving the public interest and this major innovation would be a giant step forward, to that end.*

2. How will your station use a supplemental audio channel?

*Wyoming Public Radio would immediately implement a new and separate radio service for Wyoming citizens. Our current plans include establishing a 24 hour, seven days per week classical music network within the state. Wyoming now has no fulltime broadcast of classical music from within the state, available to all. If we are successful in obtaining second stations in cities across the state, our intention is to multiplex them as well.*

*We are considering minority citizen service for Hispanics in the state, in partnership with a new LPFM Hispanic citizen group. We are also considering other music services such as jazz, and expanded information possibilities as well. As public broadcasters, we have always been limited by attempting to serve the public via one channel. Given Americans’ great predilection for choice and our nation’s growing diversity in so many areas, multiplexing offers public service broadcasters their greatest and most substantive hope to accomplish their mission.*

*In summary, multiplexing provides Wyoming with a very cost-effective means of expanding the quality and quantity of local, diverse programming and maximizing our service across the entire state for many who otherwise will never be served by public **or commercial** radio.*

3. Explain how a supplemental audio channel will allow your station to improve and expand services to current and new audiences. Does the availability of an

additional audio programming channel enhance local offerings and encourage programming and audience diversity?

*As described in Number 2 above, Wyoming Public Radio will make far more efficient use of its licensed spectrum in the public's interest by offering new and separate streams of programming for audiences either under-served or not served at all by any broadcaster. And these services would be offered by broadcasters from **within** the state, at a time when radio is increasingly created and run from distant, out-of-state large corporations with no local ties or interest.*

*With multiplexing capability, we could provide more public service to more Americans, effectively, locally, and importantly – efficiently. Multiplexing is highly cost effective. Compared with the decade long, money, labor, legal and time intensive effort we have invested in building a statewide public service network for Wyoming via new frequency applications in every case, multiplexing would create a second state network essentially “overnight.” Resources saved could be invested instead into programming for new audiences.*

4. What local community groups or organizations could benefit from supplemental audio channel authorization and support your use of this capability?

*Nearly every community has formal and/or informal groups devoted to classical music, including local symphonies and their support societies. Wyoming also features the nationally renowned Teton Music Festival. We have broadcast Festival concerts live and on tape statewide and nationally via NPR's Performance Today. We have active relationships with these groups, promoting their activities and broadcasting their music or providing their constituents with classical music on a limited basis in the evening hours.*

*We have provided material support in engineering, technical and management areas to the new LPFM based in Laramie- La Radio - operated by and for the Hispanic citizens in the area.*

*We have also provided on-air support via public service announcements to two hundred and sixty-eight Wyoming non-profit organizations, agencies, and educational institutions in our fiscal year 2004.*

*All of the areas listed above might benefit were we able to utilize multiplexing of our existing statewide network. Providing content for and access to new channels would directly benefit the citizens and organizations listed above, and more. And if we are successful in applications for new frequencies, digital conversion would make sense for them as well, were multiplexing sanctioned. Multiple networks serving much of the state would be established, each serving citizens in large part unserved today.*

5. What regulatory steps will best support the FCC's goal of fostering and protecting public service programming?

*Approving the use by current licensees of their licensed spectrum for multiplexing purposes and with the flexibility to determine themselves the local services best suited and able to be supported and sustained is the most significant step we would ask the Commission to support.*

*Wyoming Public Radio, and indeed public radio licensees across the country have an excellent track record of adhering not only to the letter but to the spirit of the requirement to serve the public's interest in local communities, one by one, across the nation. To the extent that multiplexing might provide revenue to support that public service mission, we ask that the Commission allow such use. Our mission is to inform and to educate, which, in our opinion is the highest use for which the public's airwaves can be used. We would ask the Commission to consider this dedication and commitment and to provide non-commercial educational stations with the technical and regulatory flexibility to strengthen and support our proven ability to serve the public interest and needs with our programming mission.*

*We are energized by the prospects and opportunities for public service broadcasting that multiplexing can provide. And we are ready to move forward, with the Commission's blessing.*